

FILED

JUN 21 2023

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	CRIMINAL NO. <u>33-30076-SPM</u>
)	
Plaintiff,)	
vs.)	
NIRAV B. PATEL,)	Title 18
)	United States Code,
Defendant.)	Sections 1343, 1349

INDICTMENT**THE GRAND JURY CHARGES:**COUNT 1**Conspiracy to Commit Wire Fraud – 18 U.S.C. § 1349**

1. From on or about September 1, 2022 to on or about April 20, 2023, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, defendant,

NIRAV B. PATEL,

knowingly conspired and agreed with others known and unknown to commit an offense against the United States in violation of 18 U.S.C. § 1343, namely, to devise and participate in a scheme to defraud elderly victims, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purposes of executing the scheme and attempting to do so, knowingly caused signals and sounds to be transmitted by means of wire communication in interstate commerce.

2. The object of this conspiracy was for PATEL and his coconspirators to obtain money and other assets belonging to V.B. and other elderly victims that the conspirators were not entitled to receive.

3. It was part of the conspiracy and scheme to defraud that members of the conspiracy contacted elderly victims by email and phone and told them a fraudulent story about

why they needed to send cash and other assets to the conspirators. On at least one occasion, a conspirator making such a call falsely identified himself as law enforcement, told the victim that their financial information had been compromised, and told the victim that the victim needed to send cash and other assets to fix the issue.

4. It was part of the conspiracy and scheme to defraud that the conspirators at times instructed a victim to place cash into a bitcoin account and then take it from the victim.

5. It was further part of the conspiracy and scheme to defraud that the conspirators at times instructed a victim to give cash and other assets to a courier who picked it up at or near the victim's residence. PATEL was one of the couriers who met victims and took cash and other assets from the victims on behalf of the conspiracy. In particular, PATEL:

a. Picked up and attempted to pick up a box containing about \$51,900 cash on or about April 10, 2023 at victim V.B.'s residence in Edwardsville, Illinois.

b. Picked up and attempted to pick up a box containing about \$5,100 cash on or about April 20, 2023 at victim V.B.'s residence in Edwardsville, Illinois.

6. The funds received were kept by PATEL and his coconspirators and not returned to the victims except when the funds were intercepted by law enforcement.

7. In furtherance of and as a foreseeable consequence of the conspiracy and scheme to defraud, the conspirators caused sounds and signals to be transmitted by wire in interstate commerce, namely, V.B.'s bitcoin transactions in East Alton, Illinois, within the Southern District of Illinois, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2
Wire Fraud – 18 U.S.C. § 1343

1. Paragraphs 1-6 of Count One of this indictment are realleged here.

2. On or about March 21, 2023, in Madison County, within the Southern District of Illinois, defendant,

NIRAV B. PATEL,

for the purpose of executing the scheme to defraud described in Count One, and attempting so to do, caused to be transmitted signals and sounds by means of wire communication in interstate commerce, namely, caused V.B. to create a bitcoin account with Coinhub and deposit \$14,900 cash at a bitcoin ATM in East Alton, Illinois, sending a signal by means of wire communication in interstate commerce to servers located outside the state of Illinois.

All in violation of Title 18, United States Code, Section 1343.

A TRUE BILL.

[REDACTED]
FOREPERSON


PETER T. REED
Assistant United States Attorney


RACHELLE AUD CROWE
United States Attorney

Recommended Bond: Detention